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 Michael D. Lansky, LLC dba Avid Telecom

**UNITED STATES DISTRICT COURT
 DISTRICT OF ARIZONA**

State of Arizona, ex rel. Kristin K. Mayes,) Case No. 4:23-cv-00233-EJM
 Attorney General; State of Alabama ex rel.)
 Attorney General Steve Marshall; State of)
 Arkansas, ex rel. Tim Griffin; People of the)
 State of California ex rel. Rob Bonta,)
 Attorney General of California; State of)
 Colorado, ex rel. Philip J. Weiser, Attorney)
 General; State of Connecticut; State of)
 Delaware ex rel. Kathleen Jennings, Attorney)
 General of the State of Delaware; District of)
 Columbia; Office of the Attorney General,)
 State of Florida, Department of Legal Affairs;)
 State of Georgia, ex rel. Christopher M. Carr,)
 Attorney General of the State of Georgia;)
 State of Hawaii; State of Idaho, through)
 Attorney General Raúl R. Labrador; People)
 of the State of Illinois; State of Indiana; State)
 of Iowa ex rel. Brenna Bird, Attorney General)
 of Iowa; State of Kansas; Commonwealth of)
 Kentucky; State of Louisiana; State of Maine;)
 Maryland Office of the Attorney General;)
 Commonwealth of Massachusetts; People of)
 the State of Michigan; State of Minnesota, by)
 its Attorney General, Keith Ellison; State of)

**DEFENDANTS' UNOPPOSED MOTION
 FOR EXTENSION OF TIME
 (FIRST REQUEST)**

Mississippi *ex rel.* Attorney General Lynn Fitch; State of Missouri, *ex rel.* Andrew Bailey, Attorney General; State of Montana; State of Nebraska, *ex rel.* Michael T. Hilgers, Attorney General; State of Nevada; State of New Hampshire; State of New Jersey; State of New Mexico, *ex rel.* Raúl Torrez, Attorney General; People of the State of New York, by Letitia James, Attorney General of the State of New York; State of North Carolina, *ex rel.* Attorney General Joshua H. Stein; State of North Dakota, *ex rel.* Drew H. Wrigley, Attorney General; State of Ohio *ex rel.* Attorney General Dave Yost; State of Oklahoma *ex rel.* Attorney General Gentner Drummond; State of Oregon, *ex rel.* Ellen F. Rosenblum, Attorney General for the State of Oregon; Commonwealth of Pennsylvania, by Attorney General Michelle A. Henry; State of Rhode Island; State of South Carolina *ex rel.* Attorney General Alan Wilson; State of Tennessee; State of Texas; Utah Division of Consumer Protection; State of Vermont; Commonwealth of Virginia, *ex rel.* Jason S. Miyares, Attorney General; State of Washington; State of West Virginia *ex rel.* Patrick Morrissey, Attorney General; State of Wisconsin; and State of Wyoming,

Plaintiffs,

v.

Michael D. Lansky, L.L.C., dba
Avid Telecom, an Arizona
limited liability company;

Michael D. Lansky, individually
as a Member/ Manager/Chief
Executive Officer of Michael D.
Lansky, L.L.C., dba Avid
Telecom; and

Stacey S. Reeves, individually as
a Manager/Vice President of
Michael D. Lansky, L.L.C., dba
Avid Telecom,

Defendants.

UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)

Defendants Michael D. Lansky, LLC, Michael D. Lansky, and Stacey S. Reeves (“Defendants”), pursuant to Local Rule 7.3, respectfully move the Court for a 45-day extension to answer or otherwise respond to Plaintiffs’ complaint. Defendants request this extension to continue to evaluate a potential settlement or compromise of Plaintiffs’ claims. The Plaintiffs do not oppose this motion. In further support of their motion, Defendants state:

1. On or about May 23, 2023, Plaintiffs filed their complaint.
2. Defendants, by counsel, returned the Waiver of Service of Summons to Plaintiffs on June 13, 2023 (Reeves) and June 20, 2023 (Lansky, Lansky LLC and Avid).
3. Defendants’ deadline to answer or otherwise respond to Plaintiffs’ complaint is currently due on July 24, 2023, which time has not expired.
4. Defendants have not requested an extension of time previously.
5. Since the filing of Plaintiffs’ complaint, the parties have been engaged in early discussions about a potential resolution of Plaintiffs’ claims.
6. The parties reasonably believe that a 45-day extension to Defendants’ answer deadline will help facilitate these discussions so that the parties can determine if the case can be resolved or if the parties will need to litigate these claims.
7. On June 28, 2023, Plaintiffs informed Defendants that they did not oppose a 45-day extension to Defendants’ deadline to answer the complaint.
8. If granted, the Defendants’ new deadline to answer or otherwise respond to Plaintiffs’ complaint will be September 7, 2023.

1 WHEREFORE, Defendants Michael D. Lansky, LLC, Michael D. Lansky, and Stacey S.
2 Reeves respectfully request that the Court extend the deadline for Defendants to answer or
3 otherwise respond to Plaintiffs' complaint by 45 days until September 7, 2023.
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5 RESPECTFULLY SUBMITTED on June 10, 2023.
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7 MITCHELL | STEIN | CAREY | CHAPMAN, PC
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9 By: s/ Lee Stein

10 Lee Stein
11 Attorney for Defendant Stacey S. Reeves
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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2023, I electronically filed the foregoing Defendants' Unopposed Motion for Extension of Time (First Request) and Proposed Order with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

/s/ Kaitlin Honomichl